

FILEDUNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

MAR 18 2010

FOR THE DISTRICT OF NEW MEXICO

MATTHEW J. DYKMAN

CLERK

UNITED STATES OF AMERICA,)

Plaintiff,) CRIMINAL NO. 10-701 ACT

vs.) Counts 1-3: 29 U.S.C. § 439(b) (Falsification

GERALDINE BEGAYE,) of Annual Report Filed by Labor Union -

Defendant.) Misdemeanor)

INFORMATION

The United States Attorney Charges:

1. At all times material to this Information, the American Postal Workers Union, Local Union 689, AFL-CIO, was a labor organization engaged in an industry affecting commerce and subject to the Labor Management Reporting and Disclosure Act of 1959, 29 U.S.C. § 401, et seq.

Count 1

2. On or about March 31, 2005, in the District of New Mexico the Defendant **GERALDINE BEGAYE** did make a false statement and representation of material fact knowing it to be false in a report and document required to be filed by the American Postal Workers Union, Local Union 689, AFL-CIO, with the Secretary of Labor pursuant to Section 431 of Title 29, United States Code, that is, the annual financial report form LM4 for the union's fiscal year ending on January 31, 2005, specifically, by reporting that \$0 had been made in "total payments to officers and employees during the reporting period."

In violation of 29 U.S.C. § 439(b).

Count 2

3. On or about April 25, 2006, in the District of New Mexico the Defendant **GERALDINE BEGAYE** did make a false statement and representation of material fact knowing it to be false in a report and document required to be filed by the American Postal Workers Union, Local Union 689, AFL-CIO, with the Secretary of Labor pursuant to Section 431 of Title 29, United States Code, that is, the annual financial report form LM4 for the union's fiscal year ending on January 31, 2006, specifically, by reporting that \$0 had been made in "total payments to officers and employees during the reporting period."

In violation of 29 U.S.C. § 439(b).

Count 3

4. On or about April 16, 2007, in the District of New Mexico the Defendant **GERALDINE BEGAYE** did make a false statement and representation of material fact knowing it to be false in a report and document required to be filed by the American Postal Workers Union, Local Union 689, AFL-CIO, with the Secretary of Labor pursuant to Section 431 of Title 29, United States Code, that is, the annual financial report form LM4 for the union's fiscal year ending on January 31, 2007, specifically, by reporting that \$0 had been made in "total payments to officers and employees during the reporting period."

In violation of 29 U.S.C. § 439(b).

GREGORY J. FOURATT
United States Attorney

Subscribed for
GEORGE C. KRAEHE
Assistant United States Attorney